

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S
REPLY BRIEF IN SUPPORT OF ITS MOTION TO EXCLUDE EXPERT TESTIMONY
OF JONATHAN PUTNAM, PH.D. THAT IS
INCONSISTENT WITH LEGAL PRECEDENT (DKT. NO. 346)**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit K** is a true and correct copy of excerpts from the deposition transcript of Jonathan D. Putnam dated December 6, 2022.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on
January 17, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong